

2155.027

Smith & Duggan LLP
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Mary Catherine Sexton, Esq.
GES Exposition Services, Inc.
950 Grier Dr., P.O.Box 98790
Las Vegas, NV 89193-8790
Our File No.: 2155.027

July 29, 2004

In reference to: Moshen Hosseini Corporate Compliance Issue
Final Bill Through June 30, 2004

			<u>Hrs/Rate</u>	<u>Amount</u>
4/2/04	GAB	Telephone call to Mr. Hosseini with status of case	0.10 @160.00/hr	16.00
	GAB	Receive and start review of personnel records of Mr. Hosseini's accusers	0.40 @160.00/hr	64.00
4/6/04	CAD	Telephone call from Attorney Sexton regarding status of defenses and upcoming pre-trial conference	0.10 @225.00/hr	22.50
	GAB	Telephone conference with prosecutor regarding status of case and his intent to provide police reports	0.20 @160.00/hr	32.00
	GAB	Conference with Attorney Duggan regarding status of investigation	0.20 @160.00/hr	32.00
	GAB	Conclude review of personnel records of Joseph Bavis	0.70 @160.00/hr	112.00
	GAB	Work on correspondence to Mr. Hosseini regarding ethical issues concerning representation	0.50 @160.00/hr	
4/7/04	CAD	Revise and finalize reservation of rights letter to Moshen Hosseini	0.40 @225.00/hr	
	GAB	Work on client agreement; telephone call to Mr. Hosseini regarding status and change of telephone number	1.50 @160.00/hr	
4/12/04	GAB	Telephone conference with Mr. Hosseini regarding status of case and possibility of pre-trial disposition	0.20 @160.00/hr	32.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
	GAB	Telephone conference with new assistant district attorney on case requesting police reports and providing background of allegations	0.20 @160.00/hr	32.00
4/14/04	CAD	Receive reservation letter from client; receive email from Attorney Sexton; prepare reply with reservation letter attached	0.30 @225.00/hr	
4/15/04	GAB	Receive and review correspondence from Ms. Sexton requesting whether Pre-Trial Conference will occur tomorrow	0.10 @160.00/hr	16.00
	GAB	Draft status report to Attorney Duggan regarding what has happened in case and what is expected to happen in the future	0.40 @160.00/hr	64.00
	GAB	Receive and review correspondence from Attorney Duggan to Ms. Sexton inquiring into issues that may affect decision whether to pursue civil remedy against accusers of Mr. Hosseini	0.10 @160.00/hr	
	GAB	Receive and review correspondence from Ms. Sexton with social security number for Joseph Bavis in order to request his Board of Probation record	0.10 @160.00/hr	16.00
4/16/04	GAB	Conference with Moshen Hosseini regarding Pre-Trial Conference	0.20 @160.00/hr	32.00
	GAB	Attendance at Pre-Trial Conference in Boston Municipal Court	1.80 @160.00/hr	288.00
4/22/04	GAB	Draft memorandum to Attorney Duggan regarding acquisition of criminal records in Massachusetts and best ways to obtain criminal record of Joseph Bavis	0.90 @160.00/hr	144.00
	GAB	Receive and review correspondence from Attorney Duggan to Ms. Sexton regarding strategy chosen to obtain criminal record of Joseph Bavis	0.10 @160.00/hr	16.00
4/27/04	GAB	Telephone call to ADA Eisenstadt requesting police reports	0.10 @160.00/hr	16.00
4/28/04	CAD	Telephone call from Attorney Sexton regarding Delaware issue with Reservation of Rights letter	0.20 @225.00/hr	
	CAD	Prepare email to S. Twist regarding Delaware issue	0.10 @225.00/hr	

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/29/04	CAD	Receive email from Attorney Twist regarding application of Delaware law to agreement and representation	0.50 @225.00/hr	
4/30/04	CAD	Receive and review GES bylaws and prepare correspondence to Attorney Sexton regarding application to reservation letter for Moshen Hosseini	0.60 @225.00/hr	
5/4/04	CAD	Telephone call from Attorney Mary Catherine Sexton regarding union complaint against GES labor supervisor at Hynes Convention Center; prepare memorandum on assignment	0.30 @225.00/hr	67.50
	CAD	Telephone conference with Joseph Sangregorio of GES regarding complaint by Joseh Bavis and perhaps others against Mr. Hosseini; prepare memorandum summarizing information provided and investigation to complete; begin work on defense of criminal complaint; research regarding terms of engagement allowed given firm's representation of GES	2.50 @225.00/hr	
5/5/04	CAD	Conference call with Attorney Sexton regarding allegations of Joe Bavis and Perry, also discussion of the split in Local 82 and historic and political impact of the split, and potential tactical advantages to be gained	0.60 @225.00/hr	135.00
	CAD	Conference with Attorney Butler regarding developments at jail and meeting time with new client; second call to Attorney Sexton and Mr. Sangregorio to relate developments	1.00 @225.00/hr	225.00
5/6/04	CAD	Work on developing evidence to prove the events alleged were falsified, attempts to obtain police report (not yet ready) discussion with Attorney Butler regarding strategies for isolating Bavis and Perry and forcing them to commit to specific stories we can prove are false	1.00 @225.00/hr	225.00
	GAB	Receive and review correspondence from Attorney Duggan to Mr. Twist regarding engagement agreement with Mr. Hosseini and related ethical issues	0.20 @160.00/hr	
5/7/04	CAD	Meeting with Attorney Butler regarding Bavis and Perry investigation and strategies for defending allegations in light of reluctance of Boston Police Detective to cooperate and refusal of BPD to produce police report	1.00 @225.00/hr	225.00
	GAB	Receive and review audio tape of Joseph Perry's telephone complaint to GES on May 3, 2004	0.20 @160.00/hr	32.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/7/04	GAB	Telephone call to the assistant district attorney to request police reports	0.10 @160.00/hr	16.00
	GAB	Draft correspondence to the assistant district attorney to request police reports and advise him of motions to be filed	0.70 @160.00/hr	112.00
	GAB	Telephone conference with assistant district attorney regarding identity of complaining witness, police reports generated and problems with the case	0.30 @160.00/hr	48.00
	GAB	Conference with Attorney Duggan regarding disclosures made by assistant district attorney and strategy for defending case in light of new disclosures	0.30 @160.00/hr	48.00
5/12/04	GAB	Telephone conference with Mr. Hosseini regarding disclosures made by assistant district attorney and strategy for defending case in light of new disclosures	1.00 @160.00/hr	160.00
	GAB	Telephone conference with Mr. Hosseini confirming meeting before hearing tomorrow	0.10 @160.00/hr	16.00
5/13/04	GAB	Meet with Mr. Hosseini to prepare for Pre-Trial Hearing	0.50 @160.00/hr	80.00
	GAB	Conference with ADA Eisenstadt concerning discovery and meeting to discuss credibility of complaining witness	0.30 @160.00/hr	48.00
	GAB	Attendance at Pre-Trial Hearing in Boston Municipal Court	2.20 @160.00/hr	352.00
	GAB	Conference with Mr. Hosseini regarding trial strategy	1.00 @160.00/hr	160.00
	GAB	Conference with Attorney Duggan regarding results of Pre-Trial Hearing and conference with ADA regarding weaknesses in prosecution's case	0.40 @160.00/hr	No Charge
5/14/04	GAB	Work on motion for criminal record of Joseph Bavis	0.40 @160.00/hr	64.00
	GAB	Work on motion for criminal record of Joseph Bavis	0.50 @160.00/hr	80.00
	GAB	Telephone conference with ADA Eisenstadt regarding his assent to motion for criminal record of Joseph Bavis and request that he preserve turret tape of Bavis's telephone conference with police	0.10 @160.00/hr	16.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
	GAB	Review GES records, attorney notes and court documents to prepare for trial	3.60 @160.00/hr	576.00
	GAB	In court for conference with court regarding the court's need to reschedule hearing on motion for criminal record of Joseph Bavis	1.90 @160.00/hr	304.00
	GAB	Telephone call to Steve Casterline to advise him of trial date	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Teamster John Perry to advise him of trial date and discuss theories of defense	0.30 @160.00/hr	48.00
	GAB	Draft correspondence to John Perry concerning trial date and Joseph Bavis	0.40 @160.00/hr	64.00
	GAB	Telephone conference with Attorney Duggan confirming authority to retain investigator to investigate allegation that Joseph Bavis made prior false complaint of sexual assault	0.10 @160.00/hr	16.00
	GAB	Draft motion to preserve turret tape of Bavis telephone call to police	0.40 @160.00/hr	64.00
	GAB	Work on motion for court ordered production of Massachusetts Department of Employment & Training records of Joseph Bavis to show Bavis was not working at time of alleged workplace assault	1.10 @160.00/hr	176.00
5/17/04	GAB	Telephone conference with John DiNatale of DiNatale Investigative Services to retain investigator and to explain assignment to investigate allegation that Joseph Bavis made prior false complaint of sexual assault	0.40 @160.00/hr	64.00
	GAB	Draft correspondence to John DiNatale confirming assignment	0.60 @160.00/hr	96.00
	GAB	Telephone conference with Steve Casterline regarding the need for show schedules for 2003	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Joseph Sangregorio regarding status of case and the need for additional GES records to defend Mr. Hosseini	0.30 @160.00/hr	48.00
	GAB	Draft correspondence to Joseph Sangregorio regarding status of case and the need for additional GES records to defend Mr. Hosseini	1.30 @160.00/hr	208.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/18/04	GAB	Legal research to support motions for court orders for the production of the disability and unemployment compensation records of Joseph Bavis	0.90 @160.00/hr	144.00
	GAB	Prepare motion for court order for production of Division of Employment & Training records concerning Joseph Bavis	1.80 @160.00/hr	288.00
	GAB	Prepare motion for court order for production of Teamster Health and Disability records concerning Joseph Bavis	2.00 @160.00/hr	320.00
	GAB	Telephone conference with Mr. Hosseini regarding GES's leadership training that may conflict with trial date, need for Corey Tang's testimony at trial and status of trial preparation	0.30 @160.00/hr	48.00
	GAB	Prepare memorandum to file regarding the telephone conference with Mr. Hosseini regarding GES's leadership training that may conflict with trial date and the need for Corey Tang's testimony at trial	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Maryann Passiatore regarding GES records needed for trial	0.20 @160.00/hr	32.00
	GAB	Prepare memorandum regarding witnesses needed to be summonsed for trial	0.60 @160.00/hr	96.00
	GAB	Telephone conference with ADA Eisenstadt regarding his assent to each of the four Pre-Trial Motions and scheduling each for hearing	0.20 @160.00/hr	32.00
	GAB	Travel to court for hearing on motions to preserve Joseph Bavis's 911 call to police, to order production of TeamsterCare records of Bavis's disability, to order production of Massachusetts Division of Employment & Training records concerning Bavis's application and receipt of unemployment benefits, and to obtain the criminal record of Joseph Bavis	0.40 @160.00/hr	64.00
	GAB	In-court waiting for hearing on motions to preserve Joseph Bavis's 911 call to police, to order production of TeamsterCare records of Bavis's disability, to order production of Massachusetts Division of Employment & Training records concerning Bavis's application and receipt of unemployment benefits, and to obtain the criminal record of Joseph Bavis	3.50 @160.00/hr	560.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/19/04	GAB	Participate in hearing on motions to preserve Joseph Bavis's 911 call to police, to order production of TeamsterCare records of Bavis's disability, to order production of Massachusetts Division of Employment & Training records concerning Bavis's application and receipt of unemployment benefits, and to obtain the criminal record of Joseph Bavis	0.20 @160.00/hr	32.00
	GAB	Travel from court after hearing on motions to preserve Joseph Bavis's 911 call to police, to order production of TeamsterCare records of Bavis's disability, to order production of Massachusetts Division of Employment & Training records concerning Bavis's application and receipt of unemployment benefits, and to obtain the criminal record of Joseph Bavis	0.90 @160.00/hr	144.00
	GAB	Prepare correspondence to keepers of records regarding instructions for the response to the summons duces tecum	0.40 @160.00/hr	64.00
	GAB	Draft memorandum regarding the requests to various courts of the Commonwealth requesting certified records of Bavis's convictions	0.50 @160.00/hr	80.00
	GAB	Conference with Attorney Duggan regarding criminal record of Joseph Bavis and its effect on trial strategy	0.20 @160.00/hr	32.00
	GAB	Review summonses duces tecum for Teamsters and Division of Employment & Training for service	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Corey Tang regarding her prospective testimony concerning Mr. Hosseini's innocence	0.20 @160.00/hr	32.00
	GAB	Prepare memorandum regarding the telephone conference with Corey Tang and her prospective testimony concerning Mr. Hosseini's innocence	0.10 @160.00/hr	16.00
5/20/04	GAB	Prepare case budget for GES as requested by client	2.10 @160.00/hr	
5/21/04	GAB	Telephone call from the private investigator regarding the fact that Peter Doherty no longer works for Freeman Decorating and request for direction	0.10 @160.00/hr	16.00
	GAB	Prepare correspondence to Ms. Sexton advising her of status of Doherty investigation and requesting permission to continue investigation	0.20 @160.00/hr	32.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/24/04	GAB	Telephone conference with Mr. DiNatale regarding his efforts to locate Peter Doherty, former supervisor of Bavis, who was allegedly accused falsely by Bavis of sexual assault	0.10 @160.00/hr	16.00
	GAB	Telephone conference with keeper of records for DET regarding DET's intent to assert privilege, basis for privilege, and refusal to produce Bavis unemployment records	0.30 @160.00/hr	48.00
	GAB	Telephone conference with counsel for DET regarding foundation of DET's privilege	0.20 @160.00/hr	32.00
	GAB	Telephone conference with John DiNatale regarding information that he received that Mr. Doherty moved from Massachusetts to Vermont to Massachusetts	0.20 @160.00/hr	32.00
	GAB	Prepare memorandum regarding latest information on Mr. Doherty	0.10 @160.00/hr	16.00
	GAB	Legal research on Massachusetts state constitutional right to information in DET records and evolving protocol implemented by the SJC to balance statutory privileges and constitutional rights	4.30 @160.00/hr	688.00
5/25/04	GAB	Telephone conference with counsel for DET regarding his intent to file motion to quash and Mr. Hosseini's theory of relevance to overcome DET's privilege to withhold records	0.30 @160.00/hr	48.00
	GAB	Prepare correspondence to Peter Doherty, Bavis's former supervisor who allegedly was also falsely accused of sexual assault by Bavis, requesting his assistance in this matter	0.70 @160.00/hr	112.00
	GAB	Legal research on evolving protocol implemented by the SJC to balance statutory privileges and constitutional rights	1.30 @160.00/hr	208.00
	GAB	Receive and review DET's motion to quash summons duces tecum	0.30 @160.00/hr	48.00
	GAB	Telephone conference with counsel for DET regarding receipt of motion to quash and intent to serve ADA Eisenstadt	0.10 @160.00/hr	16.00
	GAB	Telephone conference with John Perry regarding his need to attend meeting on morning of trial	0.10 @160.00/hr	16.00
	GAB	Start preparing opposition to DET's motion to quash summons duces tecum	3.90 @160.00/hr	624.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/26/04	GAB	Legal research on flux in Massachusetts law concerning protocol for criminal defendant to overcome statutory privilege for opposition to DET's motion to quash summons duces tecum	3.30 @160.00/hr	528.00
	GAB	Work on opposition to DET's motion to quash summons duces tecum	4.80 @160.00/hr	768.00
5/27/04	CAD	Conference with Attorney Butler regarding strategies for compelling the Boston PD investigator to appear at trial and admit to deficiencies in investigation; also discuss potential witnesses to be subpoenaed by Moshen from Local 82	0.40 @225.00/hr	90.00
	GAB	Receive and review correspondence from DET to court requesting a hearing on motion for quash	0.10 @160.00/hr	16.00
	GAB	Receive and review certified copies of convictions of Bavis from Boston Municipal Court and Dorchester District Court	0.20 @160.00/hr	32.00
	GAB	Receive and review certificate of service for summonses to Teamsters HealthCare and DET	0.10 @160.00/hr	16.00
	GAB	Receive and review TeamsterCare records for Bavis's disability from November 22, 2002 through May 30, 2003	0.30 @160.00/hr	48.00
	GAB	Receive and review GES records for 2002 - 2004 shows	0.80 @160.00/hr	128.00
	GAB	Telephone conference with Joseph Sangregorio regarding status of case	0.20 @160.00/hr	32.00
	GAB	Prepare correspondence to Joseph Sangregorio regarding case strategy and necessary GES witnesses	0.40 @160.00/hr	64.00
	GAB	Work on opposition to DET's motion to quash the summons duces tecum	5.80 @160.00/hr	928.00
5/28/04	CAD	Telephone call from Attorney Mary Catherine Sexton regarding trial date and importance of recognizing potential difficulties raised by calling many of the Union employees as witnesses who are needed to move in scheduled show at The Hynes	0.20 @225.00/hr	45.00
	CAD	Meeting with Attorney Butler to discuss trial and evidence strategies; review of Massachusetts law on Abuse of Process or Malicious Prosecution	2.00 @225.00/hr	450.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/28/04	CAD	Telephone call from Joseph Sangregorio regarding timing of trial and issues presented by use of work force as witnesses	0.20 @225.00/hr	45.00
	GAB	Work on opposition to DET's motion to quash	0.60 @160.00/hr	96.00
	GAB	Receive and review conviction of Joseph Bavis from Marlborough District Court	0.10 @160.00/hr	16.00
	GAB	Prepare for hearing on motion for quash by reviewing exhibits	0.20 @160.00/hr	32.00
6/1/04	GAB	Telephone call to assistant district attorney to notify him of hearing on motion to quash	0.10 @160.00/hr	16.00
	GAB	Appear in court for hearing on motion to quash; argue against motion to quash and receive court order to further investigate alternative source for DET records and to return for conclusion of hearing tomorrow	1.70 @160.00/hr	272.00
	GAB	Appear at offices of DET to discuss possible fraud on DET committed by Joseph Bavis	0.50 @160.00/hr	80.00
	GAB	Conference with counsel for DET to discuss possible agreed resolution of DET's motion to quash and possible fraud on DET committed by Joseph Bavis	0.40 @160.00/hr	64.00
	GAB	Travel to office from conference with counsel for DET regarding possible agreed resolution of DET's motion to quash and possible fraud on DET committed by Joseph Bavis	0.90 @160.00/hr	144.00
	GAB	Telephone conference with counsel for DET regarding documents that GES should have from DET concerning Bavis that may obviate the need for DET records	0.30 @160.00/hr	48.00
	GAB	Telephone conference with Mr. Sangregorio regarding court's request that GES produce all DET records before it orders records from the DET, status of GES witnesses for trial and status of investigation for Mr. Doherty	0.30 @160.00/hr	48.00
	GAB	Telephone conference with John Perry regarding Teamster records that may be helpful to defense and the need for a summons duces tecum for those records	0.20 @160.00/hr	32.00
	GAB	Draft memorandum regarding telephone conference with John Perry	0.10 @160.00/hr	16.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/1/04	GAB	Telephone conference with John DiNatale regarding status of investigation for Mr. Doherty and additional options available	0.20 @160.00/hr	32.00
	GAB	Review trial summonses to John Perry, Brian Perry and Teamsters Local 82	0.10 @160.00/hr	16.00
	GAB	Receive and start review of GES 2002 and 2003 payroll records for Boston	0.60 @160.00/hr	96.00
	GAB	Draft correspondence to Ms. Passiatore inquiring whether GES has record of Bavis working in January or February 2004	0.10 @160.00/hr	16.00
	GAB	Telephone conference with counsel for DET regarding status of my investigation into DET records of Bavis, the fact that GES does not possess additional DET records, and how Mr. Hosseini can not obtain information contained in DET's records	0.40 @160.00/hr	64.00
	GAB	Receive and review certified copies of Bavis's conviction for drug possession, charges of assault & battery and application, affidavit, and order for c. 209A restraining order	0.30 @160.00/hr	48.00
6/2/04	GAB	Telephone call to Andrea Smith of Jon Jay requesting all DET documents concerning Bavis's unemployment benefits	0.10 @160.00/hr	16.00
	PAM	Notarize Summons Duces Tecum to John Perry and two Trial Summons to John and Brian Perry for Attorney Butler; enter information into notary journal	0.80 @90.00/hr	72.00
	GAB	In court to report on DET records in possession of GES and further argue motion to quash summons duces tecum for DET records of Bavis unemployment in October and November	1.40 @160.00/hr	224.00
	GAB	Report to court on DET records in possession of GES, further argue motion to quash summons duces tecum for DET records of Bavis unemployment in October and November; receive court order that DET must produce Bavis application for benefits before court will rule on motion to quash at tomorrow's hearing	1.20 @160.00/hr	192.00
	GAB	Receive and review correspondence from Ms. Passiatore regarding fact that GES has no records of Bavis working in January or February 2004	0.10 @160.00/hr	16.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/2/04	GAB	Receive and review record of Bavis earnings for 2002 provided by Ms. Passiatore	0.10 @160.00/hr	16.00
	GAB	Receive and review certified copy of docket sheet only for Bavis's 1980 conviction for possession of class A substance	0.10 @160.00/hr	16.00
	GAB	Telephone call from counsel for DET regarding GES payroll records and dates of alleged assault so that he can obtain all relevant documents for court	0.20 @160.00/hr	32.00
	GAB	Telephone conference with Mr. Hosseini regarding status of investigation	0.20 @160.00/hr	32.00
	GAB	Review documents provided by GES to determine what documents should be disclosed in discovery to the Commonwealth	2.40 @160.00/hr	384.00
	GAB	Telephone call to Mr. McGuire of the Hynes Convention Center to advise him that he will be summonsed for trial	0.10 @160.00/hr	16.00
	GAB	Review trial summonses for Messrs. Geary and McGuire, and Delilah Murphy for service	0.20 @160.00/hr	32.00
	GAB	Telephone conference with counsel for DET regarding the results of DET computer search for Bavis records	0.10 @160.00/hr	16.00
	GAB	Prepare memorandum to file regarding telephone conference with counsel for DET regarding the results of DET computer search for Bavis records	0.20 @160.00/hr	32.00
	GAB	Telephone conference with Mr. Hosseini to provide update on today's hearing motion to quash and trial status	0.20 @160.00/hr	32.00
	GAB	Telephone call from counsel for DET regarding Bavis's two applications for unemployment benefits on October 21, 2002 and November 18, 2002	0.10 @160.00/hr	16.00
	GAB	Prepare correspondence to Ms. Passiatore requesting GES payroll records of Bavis be shipped via FedEx	0.10 @160.00/hr	16.00
	GAB	Draft correspondence to prosecutor requesting stipulation on testimony of keepers of records, issues presented by the expected absence of Detective Schroeder, and confirmation that Bavis will be only Commonwealth witness	1.00 @160.00/hr	160.00
	GAB	Receive and review correspondence from Ms. Passiatore regarding her intention to ship GES payroll records via FedEx	0.10 @160.00/hr	16.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
	GAB	Conference with Attorney Duggan regarding GES's staffing issues and trial date	0.20 @160.00/hr	32.00
	GAB	Telephone conference with Pat Geary regarding his expected trial testimony	0.40 @160.00/hr	64.00
	GAB	Prepare memorandum regarding the telephone conference with Pat Geary regarding his expected trial testimony	0.10 @160.00/hr	16.00
	GAB	Telephone conference with John Corkery regarding his expected trial testimony	0.30 @160.00/hr	48.00
	GAB	Prepare memorandum regarding the telephone conference with John Corkery regarding his expected trial testimony	0.10 @160.00/hr	16.00
	GAB	Prepare memorandum regarding the fact that telephone numbers of Brian Perry and James DiMikas have been disconnected	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Casterline regarding status of case and GES's staffing issues for Boston next week	0.20 @160.00/hr	32.00
	PAM	Notarize Summons Duces Tecum to keeper of records of Public Safety Office and Trial Summons to Kevin McGuire, Delia Murphy, John Corkery, Patrick Geary and Steve Casterline for Attorney Butler; update notary journal	1.10 @90.00/hr	99.00
6/3/04	GAB	Prepare outline for conference with prosecutor to dismiss case	0.80 @160.00/hr	128.00
	GAB	In Boston Municipal Court to argue against motion to quash summons to DET (as ordered by court) and explain to court all the exculpatory evidence in Mr. Hosseini's possession	2.60 @160.00/hr	416.00
	GAB	Conference with prosecutor to set up meeting to discuss dismissal of case and brief summary of reasons for meeting	0.20 @160.00/hr	32.00
	GAB	Conference with Attorney Duggan regarding status of motion to quash, trial date and attempts to reach Detective Schroeder	0.20 @160.00/hr	32.00
	GAB	Telephone conference with Mr. Flynn regarding the prosecutor's intent to speak with him and review information concerning case that Mr. Flynn possesses	0.30 @160.00/hr	48.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/3/04	GAB	Prepare memorandum regarding the telephone conference with Mr. Flynn regarding the prosecutor's intent to speak with him and review information concerning case that Mr. Flynn possesses	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. DiNatale requesting that he conclude investigation of Mr. Doherty and commence investigation into residence of Detective Schroeder for service of trial summons	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Hosseini to provide an update on case including conference with prosecutor and motion to quash	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Sangregorio regarding status on case including conference with prosecutor and motion to quash	0.10 @160.00/hr	16.00
	GAB	Telephone call to prosecutor to ask him to contact Pat Geary, John Perry and James Flynn to prepare for our meeting	0.10 @160.00/hr	16.00
	GAB	Draft Motion for Bill of Particulars	0.50 @160.00/hr	80.00
	GAB	Prepare correspondence to prosecutor with bill of particulars, describing the status of motion to quash, requesting additional discovery from the Commonwealth, and providing witness names and telephone numbers so that prosecutor can contact them	0.70 @160.00/hr	112.00
	GAB	Telephone conference with John Perry to confirm that I may share his telephone number with the prosecutor	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. DiNatale regarding the results of his investigation of identity and locations of Detective Erin Schroeder, a.k.a., Erin Withington for service of trial summons	0.10 @160.00/hr	16.00
	GAB	Prepare memorandum to file regarding the telephone conference with Mr. DiNatale regarding the results of his investigation of identity and locations of Detective Erin Schroeder, a.k.a., Erin Withington for service of trial summons	0.10 @160.00/hr	16.00
	GAB	Telephone conference with counsel for DET to advise him that prosecutor has not provided information court needs for ruling on motion to quash	0.10 @160.00/hr	16.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
	GAB	Telephone call from prosecutor regarding his inability to contact Bavis to confirm date of offense	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Geary confirming that he received summons and to expect a telephone call from prosecutor	0.10 @160.00/hr	16.00
	GAB	Prepare status report to Ms. Sexton	0.70 @160.00/hr	
	PAM	Notarize Trial Summons to Erin T. Worthington for Attorney Butler	0.30 @90.00/hr	27.00
6/4/04	GAB	Telephone conference with Dennis Callahan and Kevin McGuire from the Hynes CC regarding the status of Hynes CC's attempt to collect records on Bavis and schedule for Mr. McGuire's testimony	0.20 @160.00/hr	32.00
	GAB	Prepare memorandum regarding the telephone conference with Dennis Callahan and Kevin McGuire from the Hynes CC regarding the status of Hynes CC's attempt to collect records on Bavis and schedule for Mr. McGuire's testimony	0.10 @160.00/hr	16.00
	GAB	Telephone call to prosecutor to inquire about meeting with supervisor to discuss dismissal	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Detective Schroeder regarding her receipt of trial summons and her intent to talk to prosecutor about her assent to dismissing the case	0.20 @160.00/hr	32.00
	GAB	Conference with Attorney Duggan regarding telephone conference with Detective Schroeder	0.10 @160.00/hr	16.00
	GAB	Receive and review GES payroll records of Joseph Bavis from Las Vegas	0.10 @160.00/hr	16.00
	GAB	Draft status letter to Mary Catherine Sexton regarding the telephone conference with Detective Schroeder	0.70 @160.00/hr	112.00
	GAB	Telephone conference with the prosecutor regarding his conversation with Mr. Flynn and my telephone conference with Detective Schroeder	0.20 @160.00/hr	32.00
	GAB	Telephone conference with Mr. Hosseini regarding status of efforts to get the case dismissed	0.30 @160.00/hr	48.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/4/04	GAB	Prepare status report to Ms. Sexton based upon the telephone conference with the prosecutor regarding the status of his investigation	0.20 @160.00/hr	32.00
6/7/04	GAB	Telephone conference with John Perry regarding the status of my attempts to get case dismissed and scheduling issues for trial	0.20 @160.00/hr	32.00
	GAB	Telephone conference with counsel for DET regarding the probable need to conclude motion to quash hearing tomorrow	0.10 @160.00/hr	16.00
	GAB	Receive and review copies of returns of service for ten trial summons	0.20 @160.00/hr	32.00
	GAB	Develop trial strategy	0.90 @160.00/hr	144.00
	GAB	Prepare witness list for court	0.30 @160.00/hr	48.00
	GAB	Telephone call to prosecutor to advise him of need to conclude hearing on DET's motion to quash	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Hosseini regarding the fact that prosecutor has not advised me of decision on whether he intends to prosecute case	0.10 @160.00/hr	16.00
6/8/04	GAB	Telephone conference with court regarding Judge Johnson's unavailability to conclude motion to quash	0.10 @160.00/hr	16.00
	GAB	Telephone conference with counsel for DET regarding the need to conclude motion to quash in light of trial date	0.10 @160.00/hr	16.00
	GAB	Conference with Attorney Duggan regarding status of hearing on motion to quash and prosecutor's decision to dismiss case	0.20 @160.00/hr	32.00
	GAB	In court to conclude hearing on motion to quash and conference with prosecutor on status of decision to dismiss case; conference with court re court's order allowing DET's motion to quash	1.20 @160.00/hr	192.00
	GAB	Conference with prosecutor regarding status of his office's decision to dismiss and additional information that may be helpful to prosecutor's decision to dismiss	0.20 @160.00/hr	32.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/8/04	GAB	Telephone conference with counsel for DET regarding court's decision on DET's motion to quash	0.10 @160.00/hr	16.00
	GAB	Prepare correspondence to Ms. Sexton regarding court's decision on motion to quash and conference with prosecutor on status of decision to dismiss case	1.60 @160.00/hr	256.00
	GAB	Telephone conference with prosecutor regarding additional information that his supervisor needs to make decision on dismissal of case	0.30 @160.00/hr	48.00
	GAB	Telephone conference with Ms. Sexton regarding her intent to contact Jon Jay to seek unemployment information of Bavis	0.10 @160.00/hr	16.00
	GAB	Receive and review correspondence from Ms. Sexton concerning alternative manner of introducing unemployment issue at trial	0.10 @160.00/hr	16.00
	GAB	Receive and review correspondence from Ms. Sexton to Jon Jay seeking unemployment information of Bavis	0.10 @160.00/hr	16.00
	GAB	Draft correspondence to Ms. Sexton concerning evidentiary issues arising from inability to acquire DET records	0.50 @160.00/hr	80.00
	GAB	Telephone call to John Perry requesting summonsed Teamster records before day of trial	0.10 @160.00/hr	16.00
	GAB	Receive and review correspondence from Jon Jay regarding the dates that Bavis received unemployment compensation	0.10 @160.00/hr	16.00
	GAB	Receive and review correspondence from Ms. Sexton inquiring whether GES should ask Freeman for any unemployment records	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Casterline regarding the status of trial date, witnesses needed for trial, and GES scheduling issues	0.20 @160.00/hr	32.00
	GAB	Draft correspondence to Ms. Passiato requesting clarification of Bavis payroll records in 2002	0.10 @160.00/hr	16.00
	GAB	Prepare correspondence to Ms. Sexton asking GES to ask Freeman for any unemployment records	0.10 @160.00/hr	16.00
6/9/04	CAD	Work on selection and preparation of witness testimony with Attorney Butler and telephone call to Attorney Sexton regarding status	0.80 @225.00/hr	180.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
GAB	Receive and review correspondence from Jon Jay describing his 2002 unemployment benefits	0.10 @160.00/hr	16.00	
GAB	Telephone call to Mr. Hosseini regarding status of prosecutor's decision whether to prosecute case and pretrial meeting tomorrow	0.10 @160.00/hr	16.00	
GAB	Conclude review of documentary evidence to prepare for witness examination outlines	1.50 @160.00/hr	240.00	
GAB	Telephone conference with John Perry regarding side job Mr. Bavis is performing	0.10 @160.00/hr	16.00	
GAB	Receive and review records of Teamsters regarding Bavis	0.10 @160.00/hr	16.00	
GAB	Prepare motion in limine to permit chalks	1.20 @160.00/hr	192.00	
GAB	Conference with Attorney Duggan regarding trial strategy	0.40 @160.00/hr	64.00	
GAB	Telephone conference with Mr. Casterline regarding the need for Mr. Flynn's testimony and Atlantic City and Javits Center records	0.20 @160.00/hr	32.00	
GAB	Work on documents to be enhanced for trial chalks	0.40 @160.00/hr	64.00	
GAB	Receive and review new GES payroll records of Bavis	0.10 @160.00/hr	16.00	
GAB	Telephone conference with Mr. McGuire regarding the need for MCCA records before tomorrow's trial and his expected testimony	0.20 @160.00/hr	32.00	
GAB	Telephone call to prosecutor confirming that no testimony is needed to introduce records at trial	0.10 @160.00/hr	16.00	
GAB	Receive and review MCCA records regarding Bavis	0.30 @160.00/hr	48.00	
GAB	Telephone conference with prosecutor regarding his intent to request continue trial date and new witnesses against Mr. Hosseini	0.10 @160.00/hr	16.00	

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/9/04	GAB	Prepare memorandum regarding the telephone conference with prosecutor regarding his intent to request continue trial date and new witnesses against Mr. Hosseini	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Hosseini regarding new witnesses and our attempts to interview them tonight	0.20 @160.00/hr	32.00
	GAB	Telephone call to prosecutor regarding my intent to interview all five new witnesses tonight	0.10 @160.00/hr	16.00
	GAB	Prepare memorandum regarding information Mr. Hosseini provided on five new witnesses	0.20 @160.00/hr	32.00
	GAB	Telephone conference with John Perry regarding five new witnesses and his impression of each of them	0.20 @160.00/hr	32.00
	GAB	Conference with Attorney Duggan regarding five new witnesses and strategy to address issue	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Ms. Tang and Mr. Geary regarding status of pretrial preparation	0.20 @160.00/hr	32.00
	GAB	Telephone conference with Mr. Casterline regarding five new witnesses and trial schedule	0.10 @160.00/hr	16.00
	GAB	Prepare motion for required finding of not guilty	0.50 @160.00/hr	80.00
	GAB	Telephone conference with William Dodd, newly disclosed witness by Bavis, regarding fact that he did not witness alleged assault on Bavis	0.20 @160.00/hr	32.00
	GAB	Prepare memorandum regarding the telephone conference with William Dodd, newly disclosed witness by Bavis, regarding fact that he did not witness alleged assault on Bavis	0.10 @160.00/hr	16.00
	GAB	Telephone conference with William Benner, newly disclosed witness by Bavis, regarding fact that he did not witness alleged assault on Bavis and other information he will disclose to prosecutor	0.40 @160.00/hr	64.00
	GAB	Telephone conference with Morgan Crane, newly disclosed witness by Bavis, regarding fact that he did not witness alleged assault on Bavis	0.10 @160.00/hr	16.00
	GAB	Legal research on variance of proof with Commonwealth's allegations	0.40 @160.00/hr	64.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
	GAB	Telephone conference with Ronald Lewis, newly disclosed witness by Bavis, regarding fact that he did not witness alleged assault on Bavis and other information that he possessed of relationship between Bavis and Mr. Hosseini	0.50 @160.00/hr	80.00
	GAB	Telephone call to John Kenney, newly disclosed witness by Bavis, regarding the need to discuss information he has on matter	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Hosseini regarding the status of investigation into five newly disclosed witnesses	0.10 @160.00/hr	16.00
	GAB	Prepare witness outlines for examination at trial	4.00 @160.00/hr	640.00
6/10/04	GAB	Develop theory of case for opening statement	0.60 @160.00/hr	96.00
	GAB	Conference with Mr. Hosseini to prepare him to testify	1.00 @160.00/hr	160.00
	GAB	In court for hearing on Commonwealth's motion to continue trial	1.70 @160.00/hr	272.00
	GAB	Conference with prosecutor during breaks in court to explain why the Commonwealth should dismiss the matter today and have Mr. Casterline engage in conference with prosecutor regarding same	2.20 @160.00/hr	352.00
	GAB	Conference with Mr. Hosseini regarding decision-making process of prosecutor	0.30 @160.00/hr	48.00
	GAB	Telephone conference with John Perry regarding outcome of Commonwealth's motion to continue	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Geary regarding outcome of Commonwealth's motion to continue	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Corkery regarding outcome of Commonwealth's motion to continue	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. McGuire regarding outcome of Commonwealth's motion to continue	0.10 @160.00/hr	16.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/10/04	GAB	Telephone conference with Ms. Tang regarding outcome of Commonwealth's motion to continue and need to assist prosecutor to interview Teamsters for potential dismissal	0.20 @ 160.00/hr	32.00
	GAB	Telephone conference with Mr. Flynn regarding outcome of Commonwealth's motion to continue and need to assist prosecutor to interview Teamsters for potential dismissal	0.10 @ 160.00/hr	16.00
	GAB	Telephone call to Mr. Sangregorio regarding outcome of Commonwealth's motion to continue and status of potential dismissal	0.10 @ 160.00/hr	16.00
	GAB	Telephone conference with Attorney Duggan regarding outcome of Commonwealth's motion to continue and strategy to advance case to influence prosecutor to dismiss case	0.30 @ 160.00/hr	48.00
	GAB	Telephone call to prosecutor to advise him of assistance that will be provided to him to interview potential witnesses provided to him this morning from Bavis	0.10 @ 160.00/hr	16.00
	GAB	Receive and review facsimile copy of Bavis conviction for carrying firearm and assault and battery by revolver	0.10 @ 160.00/hr	16.00
	GAB	Telephone conference with John Kenney regarding that fact that he allegedly witnessed a sexual assault on Bavis and the fact that he never reported this to anyone	0.30 @ 160.00/hr	48.00
	GAB	Prepare memorandum regarding the telephone conference with John Kenney regarding the fact that he allegedly witnessed a sexual assault on Bavis and the fact that he never reported this to anyone	0.10 @ 160.00/hr	16.00
	GAB	Telephone conference with Mr. Hosseini regarding Mr. Kenny's allegations	0.20 @ 160.00/hr	32.00
	GAB	Telephone conference with John Perry regarding Mr. Kenney's allegations	0.20 @ 160.00/hr	32.00
	GAB	Prepare status report to Ms. Sexton after learning of Kenney allegations	0.80 @ 160.00/hr	128.00
	GAB	Telephone call to prosecutor offering to assist him to interview witnesses	0.10 @ 160.00/hr	16.00
	GAB	Telephone conference with Ms. Tang and Mr. Geary regarding prosecutor's apparent unwillingness to speak to witnesses today	0.10 @ 160.00/hr	16.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
	GAB	Telephone conference with Mr. Flynn regarding prosecutor's apparent unwillingness to speak to witnesses today and facts of Kenney's allegation	0.20 @160.00/hr	32.00
	GAB	Receive and review correspondence from Sexton regarding whether Kenney mentioned date of his alleged observations	0.10 @160.00/hr	16.00
	GAB	Prepare correspondence to Ms. Sexton regarding Kenney's alleged inability to recall exact date of his alleged observations	0.10 @160.00/hr	16.00
6/11/04	GAB	Telephone conference with Mr. Hosseini regarding strategy for pursuing dismissal and trial preparation in light of recent statements by John Kenney	0.50 @160.00/hr	80.00
	GAB	Legal research on Commonwealth's obligation to disclose exculpatory evidence	1.10 @160.00/hr	176.00
	GAB	Prepare memorandum for trial summons to issue	0.30 @160.00/hr	48.00
	GAB	Prepare correspondence to Detective Schroeder regarding the need for her testimony at trial	0.80 @160.00/hr	128.00
	GAB	Prepare motion for exculpatory evidence	0.90 @160.00/hr	144.00
	GAB	Prepare Motion for Unredacted Police Report	0.80 @160.00/hr	128.00
	GAB	Prepare correspondence to prosecutor regarding intent to file three additional motions and Bavis' Fifth Amendment issue	0.60 @160.00/hr	96.00
	GAB	Prepare correspondence to Ms. Sexton requesting permission to have private investigator take statements of Messrs. Lewis, Benner Dodd, and Kenney	0.40 @160.00/hr	64.00
	GAB	Telephone call to Mr. Casterline inquiring about the work schedule of Messrs. Dodd, Lewis, Kenney and Benner for private investigator in the event that statements must be taken	0.10 @160.00/hr	16.00
	GAB	Receive and review correspondence from Ms. Sexton to obtain statements from Messrs. Dodd, Lewis, Kenney and Benner	0.10 @160.00/hr	16.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/11/04	GAB	Telephone call to private investigator to inquire if he could take the statements of Messrs. Dodd, Lewis, Kenney and Benner	0.10 @160.00/hr	16.00
	GAB	Prepare correspondence to private investigator regarding the statements made by Messrs. Dodd, Lewis, Kenney and Benner over the telephone to me and request to obtain written statements from each	1.30 @160.00/hr	208.00
	GAB	Telephone conference with prosecutor regarding his intent to dismiss the case on Monday	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Hosseini regarding prosecutor's intent to dismiss case on Monday	0.10 @160.00/hr	16.00
	GAB	Prepare correspondence to Ms. Sexton regarding prosecutor's intent to dismiss case on Monday and inquiring whether investigator should pursue obtaining statements from four Teamsters	0.20 @160.00/hr	32.00
	GAB	Telephone call to Mr. Casterline regarding prosecutor's intent to dismiss case on Monday	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Flynn regarding prosecutor's intent to dismiss case on Monday	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Ms. Tang regarding prosecutor's intent to dismiss case on Monday	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. John Perry regarding prosecutor's intent to dismiss case on Monday	0.10 @160.00/hr	16.00
	GAB	Telephone call to Mr. McGuire regarding prosecutor's intent to dismiss case on Monday	0.10 @160.00/hr	16.00
6/14/04	GAB	Receive and review nolle prosequi and unredacted police report from prosecutor	0.10 @160.00/hr	16.00
	GAB	Receive and review correspondence from Ms. Sexton asking that four recent person identified by Bavis as witnesses be interviewed despite the prosecutor's dismissal	0.10 @160.00/hr	
	GAB	Telephone conference with Mr. DiNatale regarding the background of assignment of interviewing Bavis's four new witnesses	0.20 @160.00/hr	

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/14/04	GAB	Work on correspondence to Mr. DiNatale regarding assignment to take statements from Messrs. Lewis, Benner, Dodd, and Kenney in light of recent developments	0.90 @160.00/hr	
	GAB	Telephone conference with John Perry regarding his receipt of a trial summons and his desire to see something done to Messrs. Bavis and Joseph Perry	0.10 @160.00/hr	
	GAB	Telephone conference with Mr. McGuire regarding the Convention Center's request for information on Joseph Perry	0.10 @160.00/hr	
	GAB	Telephone conference with Mr. Casterline regarding his wish to take action against Mr. Kenney for his false accusation against Mr. Hosseini and the schedule of the four Teamsters who Bavis claimed would corroborate his claim	0.10 @160.00/hr	
	GAB	Telephone conference with Mr. Hosseini regarding telephone number of William Dodd	0.10 @160.00/hr	
	GAB	Telephone conference with prosecutor confirming criminal case was dismissed and Mr. Hosseini did not have an out-of-state record	0.10 @160.00/hr	16.00
	GAB	Conference with Attorney Duggan regarding options for GES action against Bavis and Joseph Perry	0.30 @160.00/hr	
	GAB	Telephone conference with Mr. DiNatale regarding contact information for William Dodd	0.10 @160.00/hr	
	GAB	Work on correspondence to Ms. Sexton regarding options for GES in dealing with Bavis, Joseph Perry and Mr. Kenney	1.80 @160.00/hr	
6/16/04	GAB	Telephone conference with Mr. DiNatale regarding statements provided by Messrs. Lewis, Brenner and Crane and Mr. Kenney's refusal to provide a statement	0.20 @160.00/hr	
6/17/04	GAB	Telephone conference with Mr. Hosseini regarding his request for copy of nolle prosequi, status of private investigator's attempts to get statements and his desire to remove Messrs. Perry, Bavis and Kenney from GES work list	0.30 @160.00/hr	
	GAB	Telephone conference with Mr. Corkery confirming that he does not have to appear for trial	0.10 @160.00/hr	
	GAB	Telephone conference with Mr. Hosseini to advise him a certified copy of nolle prosequi will be obtained tomorrow due to Suffolk County holiday	0.10 @160.00/hr	

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/18/04	GAB	Telephone call from Mr. McGuire regarding his intent to return witness fees provided to Hynes Convention Center	0.10 @160.00/hr	
	GAB	Telephone conference with Ms. Sexton regarding issues GES intends to address now that criminal case has concluded	0.20 @160.00/hr	
	GAB	Prepare memorandum regarding telephone conference with Ms. Sexton regarding issues GES intends to address now that criminal case has concluded	0.20 @160.00/hr	
	GAB	Telephone conference with Mr. Hosseini regarding receipt of court documents confirming dismissal of case	0.10 @160.00/hr	
	GAB	Prepare correspondence to Ms. Sexton regarding receipt of court documents confirming dismissal of case	0.20 @160.00/hr	
	GAB	Conference with Attorney Duggan regarding the need to meet with Mr. Hosseini to determine whether he intends to file suit against Bavis	0.10 @160.00/hr	
	GAB	Telephone call to Mr. Hosseini inquiring if he wished to meet next week to discuss any potential action against Bavis	0.10 @160.00/hr	
6/21/04	GAB	Telephone conference with Mr. Hosseini regarding the agenda and schedule of conference to decide on possible litigation strategy against Bavis	0.20 @160.00/hr	
	GAB	Draft memorandum regarding scheduled meeting with Mr. Hosseini	0.10 @160.00/hr	
	GAB	Prepare correspondence to Ms. Sexton regarding scheduled meeting with Mr. Hosseini	0.20 @160.00/hr	
	GAB	Receive and review memorandum from Attorney Duggan regarding subject matter of conference with Mr. Hosseini	0.10 @160.00/hr	
	GAB	Receive and review invoice for service of trial summonses	0.10 @160.00/hr	
6/22/04	CAD	Meeting with Moshen Hosseini to review dismissal procedures and determine if further case may be brought	1.40 @225.00/hr	
	GAB	Prepare for conference with Mr. Hosseini and Attorney Duggan to discuss options to obtain relief from false arrest	0.50 @160.00/hr	

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/22/04	GAB	Conference with Mr. Hosseini and Attorney Duggan to discuss option for relief from false arrest	1.50 @160.00/hr	
6/23/04	GAB	Receive and review invoice from DiNatale Detective Agency for service performed	0.10 @160.00/hr	
	GAB	Receive and review DiNatale report of investigation for Peter Doherty and Erin Schroeder	0.10 @160.00/hr	
6/25/04	GAB	Legal research on viability of section 1983 civil rights action	5.00 @160.00/hr	
6/28/04	GAB	Receive and review correspondence from the Massachusetts Convention Center Authority with uncashed checks for witness fees served with subpoenas	0.10 @160.00/hr	
6/30/04	GAB	Receive and review June invoices and signed witness statements from DiNatale Investigations	0.10 @160.00/hr	
For professional services rendered				161.80

Legal Fees Summary

<u>Attorney</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Christopher A. Duggan	13.60	225.00	
Gerard A. Butler, Jr.	145.60	160.00	
Pamela A. McBurney	2.20	90.00	

6/30/04	CAD	Telephone, long distance	1.75
	CAD	Boston Municipal Court	20.00
	CAD	Dewsnap & Associates	621.00
	CAD	Kinko's	311.85
	CAD	LexisNexis	36.68
	CAD	Photocopies	303.80
	CAD	Postage	26.87

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		<u>Amount</u>
6/30/04	CAD Telefax	250.00
	CAD Travel, Attorney Butler	269.80
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	Total costs	\$1,841.75
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	Total time and expense charges	
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	Past Due Balance	\$5,363.00
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	Payment - Thank You	(\$5,363.00)
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	Balance	